

STATE OF SOUTH CAROLINA

(Caption of Case)
IN RE:

APPLICATION OF I-WIRELESS, LLC
FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER
IN THE STATE OF SOUTH CAROLINA

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET 201314-C
NUMBER: 2011 - 107 - C

(Please type or print)

Submitted by: Heather Kirby

SC Bar Number:

Address: 1725 Windward Concourse, Suite 150

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Other:

Email: hkirby@telecomcounsel.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input checked="" type="checkbox"/> Report	

Lance J.M. Steinhart, P.C.

Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

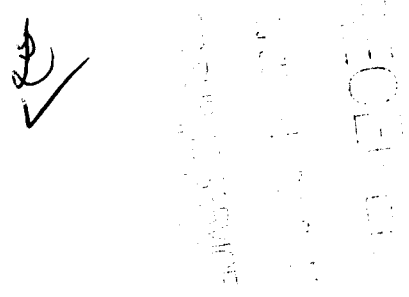
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June 27, 2013

VIA OVERNIGHT DELIVERY

Ms. Jocelyn G. Boyd
Chief Clerk of the Commission
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210
(803) 896-5100



Re: i-wireless, LLC
Docket No. 2011-107-C

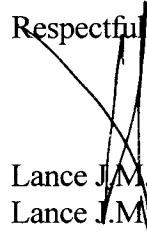
Dear Ms. Boyd:

Pursuant to Order No. 2011-766 in the above-referenced docket, enclosed please find for filing the Company's ETC Annual Report.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,


Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
Attorneys for i-wireless, LLC

Enclosures

cc: ORS via USPS (2 copies)

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2011-107-C

IN RE: Application of i-wireless, LLC)	
for Designation as an Eligible)	ETC ANNUAL REPORT
Telecommunications Carrier in the)	
State of South Carolina)	

Pursuant to 26 S.C. Code Ann. Regs. 103-690.1 and Order No. 2011-766, i-wireless, LLC (“i-wireless” or “the Company”), by undersigned counsel, hereby submits its 2013 Eligible Telecommunications Carrier (“ETC”) Annual Report and respectfully requests that the South Carolina Public Service Commission (“Commission”) certify i-wireless’ eligibility to receive federal low income support for the 2014 calendar year. i-wireless submits the following in compliance with 26 S.C. Code Ann. Regs. 103-690.1:

I. Certification of compliance with CTIA Consumer Code (103-690.1(B)(a))

i-wireless certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA Consumer Code for Wireless Service, as it is required to do pursuant to 47 C.F.R. § 54.202(a)(3).

II. Lifeline Reporting

103-690.1(b)(3) - Requests for service that were unfulfilled

i-wireless had 0 unfulfilled requests for service for the 2012 calendar year.

103-690.1(b)(4) - Number of complaints per 1,000 handsets

i-wireless had 1.8 complaints per 1,000 handsets for the 2012 calendar year.

103-690.1(b)(5) - Certification of compliance with applicable service quality standards and consumer protection rules

i-wireless certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA Consumer Code for Wireless Service.

103-690.1(b)(6) - Certification of ability to function in emergency situations

i-wireless provides service by reselling the network services of Sprint Spectrum, L.P. (“Sprint”) and certifies that it is able to remain functional in emergency situations based on 47 C.F.R. § 54.202(a)(2). i-wireless relies on Sprint’s network reliability in all situations, including emergency situations. Sprint complies with applicable requirements for emergency service, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. Sprint has implemented state-of-the-art network reliability standards and i-wireless and its customers benefit from Sprint’s high standards.

103-690.1(b)(7) - Certification regarding provision of comparable local usage plan

i-wireless certifies that it offers a local usage plan comparable to that offered by the incumbent LEC (“ILEC”) in the relevant service areas. i-wireless offers a variety of rate plans that provide its customers with local usage capabilities in the form of monthly plans, unlimited plans or pay-per-use plans—but without the burden of contracts, activation fees or roaming charges. Similar to ILEC Lifeline offerings, i-wireless customers have the option to apply the Lifeline discount to the Company’s retail rate plans and have the option for unlimited local calling. i-wireless’ offering also exceeds those of the ILEC in several respects. i-wireless offers customers a certain amount of service free of charge. i-wireless customers can use these free

minutes to place calls statewide (and even nationwide) because i-wireless does not constrict customers' use by imposing a local calling area requirement. i-wireless also provides Lifeline customers with E911 capabilities and access to voice mail, caller I.D., and call waiting services at no cost.

103-690.1(b)(8) - Certification regarding equal access

i-wireless acknowledges that the FCC may require it to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within its designated service area.

103-690.1(b)(9) - Number of Lifeline customers

i-wireless had 29,779 Lifeline customers as of December 31, 2012.

103-690.1(b)(10) - Copies of responses to the Lifeline Verification Survey or Certification filed with USAC

See attached Exhibit A for a copy of i-wireless' Annual Lifeline Certification (Form 555) filed with the Universal Service Administrative Company ("USAC") by January 31, 2013. i-wireless will also file with the Commission a copy of its FCC Annual Report (Form 481) that will be filed with USAC upon OMB approval of the Form.¹

¹ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order (rel. June 10, 2013) at ¶ 4. In the Order, the FCC waived the July 1, 2013 deadline for ETCs to file their annual report as the OMB has not yet approved the FCC Form 481. Upon approval, the FCC will issue a Public Notice to notify ETCs of the alternate filing deadline.

Respectfully submitted,



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Attorneys for i-wireless, LLC

June 26, 2013

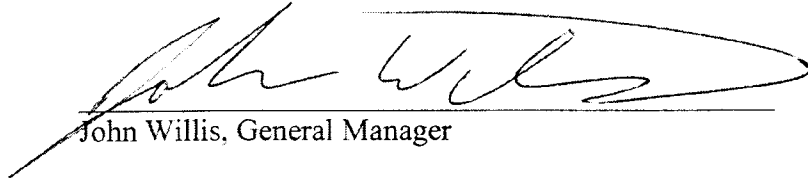
State of Kentucky
County of Campbell

)
)
)

Certification


Personally appeared before the undersigned, an officer duly authorized to administer oaths, John Willis, who first being duly sworn, deposes and states that he is the General Manager of i-wireless, LLC ("the Company"), and hereby certifies that the foregoing and attached information is true to the best of his knowledge and belief.

Dated: 6/26/13


John Willis, General Manager

Subscribed and sworn to before me this 26th day of June 2013.

(Notary Seal)


(Signature of person authorized to administer oath)

My Commission Expires: My Commission Expires August 29, 2015

EXHIBIT A

FCC Form 555 - Annual Lifeline Certification

FCC Form 555
November 2012

Annual Lifeline Eligible Telecommunications Carrier Certification Form

All carriers must complete Sections 1, 2, and 3. Carriers must complete Section 4, if applicable.

Deadline: January 31st (Annually)

South Carolina

State

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each state in which it provides Lifeline service).

249014

Study Area Code(s) (SAC)

i-wireless, LLC

ETC Name(s)

N/A

Holding Company Name(s)

Access Wireless

DBA, Marketing or Other Branding Name(s)

Affiliated ETCs (include names and SACs,
attach additional sheets if necessary)

N/A

Section 1: All ETCs (Initial the certification that applies to your ETC. Depending on the state, both certifications may apply).

I certify that the company listed above has certification procedures in place to review income and program-based eligibility documentation prior to enrolling a customer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial ←

(List the specific SAC(s) for which you are making this certification if it is not applicable to all of your study areas within the state. Attach additional sheets if necessary).

AND/OR

I certify that the company listed above confirms consumer eligibility by relying on _____ prior to enrolling a customer in the Lifeline program. (Please list the program eligibility data sources, such as ETC access to a state database and/or notice of eligibility from the state Lifeline administrator and indicate for which qualifying programs (e.g., SNAP, SSI) these sources are used to verify consumer eligibility). I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial _____

(List the specific SAC(s) for which you are making this certification if it is not applicable to all of your study areas within the state. Attach additional sheets if necessary).

FCC Form 555
November 2012

Section 2: All ETCs (Initial the certification that applies to your ETC, and if applicable, complete columns A through L the tables below. Attach additional sheets if necessary).

I certify that the company listed above has procedures in place to re-certify the continued eligibility of all of its Lifeline customers, and that, to the best of my knowledge, the company obtained signed certifications from all consumers attesting to their continuing eligibility for Lifeline, except those subscribers whose eligibility was verified by the company through the use of other sources of eligibility information as well as those subscribers who were re-certified by the state Lifeline administrator. Results are provided in the chart below. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above.

Initial

A	B
Number of Subscribers Claimed on May FCC Form(s) 497	Number of Lines Claimed on May FCC Form(s) 497 Provided to Wireline Resellers
19573	N/A

C	D	E = C-D	F	G = (E + F)	H
Number of Subscribers ETC Contacted Directly to Recertify Eligibility Through Attestation	Number of Subscribers Responding to ETC Contact	Number of Non-Responding Subscribers	Number of Subscribers Responding That They Are No Longer Eligible	Number of Subscribers De-Enrolled or Scheduled to be De-Enrolled as a Result of Non-Response or Ineligibility	Number of Subscribers Who De-Enrolled Prior to Recertification Attempt
19899	15824	4075	25	4100	7

I	J	K	L
Number of Subscribers Whose Eligibility was Reviewed By State Administrator or By ETC Access to Eligibility Data	Number of Subscribers Whose Eligibility Was Examined by State Administrator or By ETC Access to Eligibility Data and Found to be Ineligible	Number of Customers De-enrolled or Scheduled to be De-Enrolled as a Result of a Finding of Ineligibility	Number of Subscribers Who De-Enrolled Prior to Recertification Attempt

FCC Form 555
November 2012

OR

I certify that my company did not claim federal Low Income support for any Lifeline customers prior to June 2012 (insert current year). I am an officer of ~~the company~~ named above. I am authorized to make this certification for the Study Area(s) listed above. Initial _____

(List the specific SACs for which you are making this certification if it is not applicable to all of your study areas within the state. Attach additional sheets if necessary).

Section 3: All ETCs (Initial the certification below).

I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial PA

Section 4: Non-Usage Applicable to Certain Pre-Paid ETCs (the ETC does not assess or collect a monthly fee from its Lifeline subscribers)(Record the number of subscribers de-enrolled for non-usage by month in column N below)

M	N
Month	Subscribers De-enrolled for Non-Usage
January	0
February	0
March	0
April	52
May	247
June	611
July	1086
August	1778
September	2581
October	3552
November	4210
December	4309

Signed,

X

Signature of Officer

CEO

Title of Officer

Lance J.M. Steinhart, P.C.

Person Completing this Certification Form

Paul McAleese

Printed Name of Officer

1/30/2013

Date

770-232-9200

Contact Phone Number